

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
V.)	NO. 3:15-cr-30
)	VARLAN/SHIRLEY
JAMES JENKINS)	
)	
Defendant.)	

**MOTION FOR TRANSPORTATION OF DEFENDANT
OR, IN THE ALTERNATIVE, FOR A ONE DAY FURLOUGH**

Comes the Defendant, James Jenkins, by and through counsel, who moves the Court for the entry of an order requesting that the United States' Marshal Service transport James Jenkins, who is currently under U.S. Marshal custody at Blount County jail, to the Martin Oak Ridge Funeral Home, to pay his final respects to his father, Lee Thomas Jenkins, who passed away on November 26, 2015. In the alternative, Defendant moves the Court for a brief furlough. For grounds, Defendant would show the following:

1. Defendant, James Jenkins is in pre-trial detention at the Blount County jail.
2. An obituary regarding Mr. Jenkins' father can be accessed via the Martin Oak Ridge Funeral Home website at <http://www.martinfuneralhomeoakridge.com/obituaries/Lee-Jenkins/>. The receiving of friends and family is scheduled for tomorrow, December 1, 2015, at the Martin Oak Ridge Funeral Home, 1017 Turnpike, Oak Ridge, Tennessee 37830, from 5:00 P.M. to 7:00 P.M., with services to begin at 7:00 P.M.

3. Counsel would suggest a furlough could last any length of time as seen fit by the Court including and up to one calendar day. Counsel would organize transportation through the family in such an event.

Respectfully submitted this the 30th day of November, 2015.

By: s/ Jonathan A. Moffatt
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2015, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Jonathan A. Moffatt